

Atty. Dkt. No. 00CR002/KE

**REMARKS**

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

No claims are requested to be cancelled.

No claims are currently being amended.

No claims are being added.

This amendment does not add, change and/or delete claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

Claims 1-20 remain pending in this application.

On page 1 of the Office Action, claims 1-3, 5-10, 12-17, 19 and 20 are rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 4,127, 796 (Henderson) in view of U.S. Patent No. 5,821,917 (Cappels). The Examiner states:

As to claim 1, Henderson teaches a method of reducing luminance decay of emissive elements in a matrix addressed emissive display device . . . , the method comprising:

generating control data . . . corresponding to a static image . . . to be displayed . . . , wherein the control data defines an image origin . . . of the static image with respect to a display origin . . . .

Accordingly, Henderson teaches all of the claimed limitation, except for the method comprising: generating/altering in a graphic engine or processor control data.

However, Cappels teaches a related system and method of compensating for the effects of aging of the phosphors upon color

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accuracy in a CRT which comprises graphics engine, e.g., a host processor 10 and an internal processor 23 . . . .

Applicants respectfully traverse the rejection.

In paragraph 13 of the Office Action, claims 4, 11 and 18 are rejected under 35 U.S.C. § 103 as being unpatentable over Henderson in view of Cappels and further in view of U.S. Patent No. 6,369,851 (Marflak). Applicants respectfully traverse the rejection. Cappels, Henderson and Marflak are referred to below as the cited art.

As a preliminary matter, Applicants respectfully traverse the rejection because the combination of Cappels with Henderson is improper. Cappels does not even relate to the problem associated with the present invention and Henderson. There is no mention of a static image and/or screen burn-in problems in Cappels. Cappels is related to a system and method of compensating for detrimental effects relating to color accuracy. See Cappels, Col. 1, lines 20-22. This is not at all related to static image burn-in. See Cappels, Col. 4, lines 6-26. Therefore, Cappels should not be combined with Henderson because Cappels is not related to the burn-in problem of Henderson and the present invention.

For sake of argument only, even if Cappels is related, there is still no motivation to combine Henderson with Cappels to achieve the present invention. As discussed in the previous Response to Office Action, independent claims 1 and 15 recite a feature related to the alteration of control data in the graphics engine. Previously presented independent claim 8 also recites that the graphic engine alters the control data. The altering of the control data causes the static image to be substantially continuously moved. Accordingly, each of independent claims 1, 8 and 15 specifically recites a feature related to the use of the graphics engine to adjust control data for achieving burn-in protection. See present application, page 7, lines 1-3.

In contrast, Henderson does not move the static image in the manner recited in independent claims 1, 8 and 15. Indeed, Henderson does not even mention control data, but instead relies upon an analog scheme of providing a triangular wave form to move the image.

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Although the Examiner characterizes Cappels as including a graphics monitor, there is no mention of moving a static image in Cappels.

The Examiner's purported motivation to combine Cappels with Henderson would not even result in the present invention. Indeed, the Examiner states that it would have been obvious to "implement the host processor 10 and internal processor 23 (corresponding to the graphics engine as claimed) as taught by Cappels in the Henderson's CRT in order to achieve the benefit of provide an improved a system and method as needed to compensate accurately for degradation of color." However, this motivation can only result in a system that compensates for degradation of color but would not provide any protection against burn-in due to static images. One of ordinary skill in the art would rely upon the analog circuitry of Henderson for burn-in protection. There is simply no suggestion except for hindsight from the present application to substitute the analog circuit of Henderson into the graphics engine of Cappels. As mentioned in the Examiner's purported motivation, one of ordinary skill in the art would only likely use the graphics engine to achieve color degradation protection and not electrostatic detection. Marflak does not provide for the deficiencies of Henderson and Cappels. Accordingly, withdrawal of the rejection of claims 1-20 is respectfully requested because there is no motivation to combine Cappels with Henderson.

Even if Cappels, Henderson and Marflak are combined, one of ordinary skill in the art would not achieve the invention relying on the cited art. As discussed above, the only conceivable result of the combination of these references is an analog-based burn-in protection circuit. Henderson only discloses an analog burn-in protection circuit. Cappels does not even mention burn-in protection or the movement of static images. Marflak does not provide for the deficiencies of Henderson and Cappels. Therefore, withdrawal of the rejection of claims 1-20 is respectfully requested because a combination of the cited art would not achieve the invention.

In addition, Henderson teaches away from the present invention. Henderson clearly teaches burn-in protection using exclusively analog circuitry, rather than manipulating control data with the graphics engine. Henderson makes no mention of achieving burn-in protection

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through control data manipulation. Cappels and Marflak do not provide for the deficiencies described above. Therefore, withdrawal of the rejection of claims 1-20 are respectfully requested because Henderson teaches away from the present invention.

Accordingly, independent claim 1 and its dependent claims 2-7, independent claim 8 and its dependent claims 9-14, and independent claim 15 and its dependent claims 16-20 are patentable over the cited art because the combination of the cited art is improper, because the combination of the cited art does not achieve the present invention, and because Henderson teaches away from the present invention.

Lastly, independent claim 1, dependent claims 12-14 and independent claim 15 recites features relating to the definition of an image origin in the graphics engine. The origin is used to move the image according to the specific process of claims 1, 12-14 and 15. Henderson does not provide for altering the control data utilizing an image origin as recited in independent claim 1, dependent claims 12-14 and independent claim 15. The Examiner is respectfully requested to specifically point in Henderson where the reassignment of an image origin is discussed. Focus spot 28 as taught with preference to FIG. 3 is not an image origin in the control data. Rather, it is merely a place on the screen which is shown in an arbitrary position. It is not adjusted by using control data. Cappels and Marflak do not provide any discussion of image origin. Accordingly, it is respectfully submitted that independent claim 1 and its dependent claims 2-7, dependent claims 12-14 and independent claim 15 and its dependent claims 16-20 are additional patentable over the cited art.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

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The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 18-1722. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 18-1722.

Respectfully submitted,

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